Proposed Action and Alternatives (Chapter 2)

Location

Comment: *Would you rather have the lines next to each other? [RS]*

Response: Bonneville prefers to have the transmission lines adjacent to one another. Parallel transmission lines generally have less environmental impact; rights-of-way and access roads can be shared, with less vegetation removed, less habitat disturbed, and often a minimal impact on land use. It is also easier to maintain parallel lines. However, there are reliability requirements that dictate how close and which lines can parallel one another.

Comment: *What are we doing at 67/1? [RS]*

Response: In this area, the existing lines are on the south side of the highway and the proposed line would be on the north side of the highway.

Comment: *It would be no problem building a tower at 68/1. [RS]*

Response: In this area, the existing lines cross back to the north side of the right-of-way and would join the proposed line right-of-way.

Existing Corridor (ROW)

Comment: *It's convenient that there is a wide enough right-of way to accommodate the New Line. [PS]*

Response: Yes, when the original lines were constructed, additional right-of-way was purchased.

Comment: *Will towers be on the North or South side of existing towers? [PS]*

Response: Starting on the north side of the Columbia River where the line turns to parallel the river (corridor mile 3, near Plymouth), the proposed transmission line would be located on the north side of the existing lines. At about mile 68 (where the Hanford-John Day line joins the corridor), the line would cross to the south side of the existing lines.

Comment: *You'll have to buy right-of-way from the Aluminum Plant. [RS]*

Response: Bonneville would utilize its existing transmission line right-of-way for most of the project. Wherever the proposed new alignment for the transmission line

leaves the existing right-of-way, Bonneville would need to acquire easements to build, operate, and maintain the proposed transmission line facilities. Landowners would be contacted and offered fair market value for the easements, established through the appraisal process.

Comment: *Is there any plan to use wide right-of way's at this place? (T7NRZIE Sec. 14, 12 GL ENN Williams) [RS]*

Response: We were not able to locate this place within the project area.

Comment: *The EIS should state the level of certainty that Benton County PUD would request electrical service. If Benton County PUD receiving electrical service is a reasonably foreseeable future action (e.g., a signed agreement already exist), the EIS should incorporate this proposed activity into the scope of the project. Environmental studies supporting this activity should be completed prior to issuance of the final EIS, and, if appropriate, the alternative section should explain options associated with the hookup. [LTR 008]*

Response: There is no signed agreement with Benton County PUD for electrical service and details of that service are unknown. Therefore it is not possible to analyze the potential impacts in this EIS. Appropriate NEPA review would be conducted when further information is available.

Towers

Comment: *Do you use concrete for the tower footings? [RS]*

Response: Only in certain circumstances is concrete used for the tower footings. For this project concrete tower footings would probably only be used at the McNary River crossing where the tower footings would be located in wet areas. Some language has been added about concrete footing to Chapter 2, page 2-5.

Comment: *How far can you span between two towers? [RS]*

Response: Typical spans for this project would be 1,000 to 1,300 feet. With special heavier, taller structures and certain terrain (such as at river crossings) spans can be much greater.

Comment: *What type of towers will be used? [RS]*

Response: As described on pages 2-4 through 2-6 of the draft EIS and shown in Figures 2-2 and 2-3, lattice steel delta configuration towers with overhead ground wire would be used.

Conductors

Comment: *How much more does the 500 kV cable weigh as compare to the existing lines? [RS]*

Response: The proposed conductor would weigh about three times more than the conductor on the existing 230-kV transmission line.

Comment: *The EIS should define bus work. [LTR 008]*

Response: Bus work is defined on page 2-5 of the draft EIS as electricity running on a pipe instead of on conductors. The pipe is set about 30 or 41 feet off the ground and the area is fenced.

Page 2-5, paragraph 5 has been clarified regarding bus work.

Access Roads

Comment: *Would like to see an access plan between Sundale and Rock Creek. [RS]*

Response: Bonneville is working with the landowner on the access road plan through this area.

Comment: *Whose responsibility is it to maintain the roads? Will you make sure it is in as good of shape after construction, as it was before construction? [RS]*

Comment: *Access roads, if we use an access road for other things, will they be put back in original condition? Who does that? [RS]*

Comment: *I'm concerned that the roads used by Bonneville and its contractors will be left damaged and not repaired. Problems have occurred in the past and damages were never repaired, even after calls had been placed to Bonneville. [RS]*

Response: Bonneville shall repair damages to the access roads caused by or arising out of its use. Bonneville would be responsible for leaving roads and the right-of-way in as good or better condition than prior to construction. Landowners may contact the Bonneville Project Manager (Gary Beck, 503/230-6596) if road repairs are not completed.

A mitigation measure has been added to page 3-12 of the EIS regarding repairing access roads.

Comment: *Access roads -- look at graveling roads from county road up to maintenance road. [RS]*

Response: In locations where landowners gravel existing access roads, or where erosion potential of native soil roads is high, the access roads would be graveled.

Staging Areas

Comment: *The EIS should describe temporary staging areas (a map of their locations), their uses, and how they will be restored. EPA is concerned that the use of such areas for refueling or lubricating equipment might result in the contamination of the surrounding area (through fuel spills and stormwater runoff) and that these areas might not be fully restored. [LTR 008]*

Response: Temporary staging areas for vehicles and equipment are described on page 2-8 of the draft EIS. Potential impacts of the staging activities are described as part of the environmental analysis. The exact location of the sites will not be known until just prior to construction. Potential impacts at the sites will be mitigated by a Storm Water Pollution Prevention Plan (which will include a Spill Prevention Plan). In addition, the construction contractors will be provided with maps outlining areas to avoid and a list of general and site-specific mitigation measures. Site restoration would include staging areas.

Substation Work

Comment: *How will you tie into bays at McNary? [HCC]*

Response: The 500-kV yard is located on the east side of McNary Substation. The new McNary-John Day transmission line would come out of bay 7 on the north side of the 500-kV yard and head west over the McNary powerhouse lines.

Line Planning and Construction

Comment: *If Bonneville moves an existing tower, how will the area be restored? [RS]*

Response: If Bonneville removes or relocates an existing tower, Bonneville is responsible for restoring the area to as good or better condition than prior to construction.

Comment: *How much of the tower and base will be left? [RS]*

Response: In places where existing towers would be removed, all of the above ground portions would be removed and the underground footings would be left in place.

Comment: *Do you construct every tower on-site? [RS]*

Response: Typically we construct every tower onsite and lift them into place with a crane. In some locations where on-site construction is not possible (i.e. steep terrain), the tower is built off-site and lifted into place with an aircrane.

Comment: *What size equipment do you bring in? [RS]*

Response: The largest piece of equipment brought to each tower site is a 100-ton crane used to lift the towers up onto the footings.

Comment: *The EIS should contain the results of surveys including 1) determinations of the profile of the ground, 2) the proposed locations for towers, roads, and staging areas, and 3) the required right of way. [LTR 008]*

Response: This level of survey information is not developed until the project design phase. The draft EIS discusses the general terrain, locations of towers, and roads and additional right-of-way needed.

Comment: *A four (4) mile fire guard runs down Rock Creek, surveyors have to drive down and need to turnaround to come back. [RS]*

Response: Thank you for the information. Bonneville will inform the surveyors of this dead-end to help alleviate unnecessary traffic.

Construction Schedule

Comment: *Assuming you get funding, what is the timeline? [HCC]*

Comment: *When would the project get started? [PS]*

Comment: *When will construction start? [RS]*

Response: If the decision is to construct the project, Bonneville would anticipate some construction to start in fall 2002 and the project to be completed by fall 2004.

Comment: *I was expecting to see some towers being put up on the side of the road. [PS]*

Response: Consistent with its obligations under NEPA, Bonneville would not begin construction of the proposed action until after a final decision to proceed with the project is made.

Comment: *Is it possible to construct this area in the winter? [RS]*

Response: Depending on the weather, Bonneville anticipates that parts of the line would be built during the winter months.

Cost

Comment: *Where is this project in regard to funding? [HCC]*

Comment: *How certain is funding? [HCC]*

Comment: *Was project put in budget for full funding? [HCC]*

Comment: *You're already talking about third party financing. [HCC]*

Comment: *With the current energy situation, do really think you'll be able to get third party financing? [HCC]*

Comment: *Where is the funding for this project coming from? [PS]*

Response: The current proposed plan is for Bonneville to fund portions of this project, but the majority of the cost would be from third-party financing. Bonneville is presently negotiating with a group of investors for third-party financing of this project.

Comment: *How much will the project cost, including interconnecting to substation? [HCC]*

Comment: *You're looking at how many million to put the project up? [RS]*

Response: The estimated cost for constructing the entire project is about $100 million.

Comment: *Do the increased funds at the legislative level affect this project? [PS]*

Response: Bonneville is currently requesting the Federal Legislature to increase our federal borrowing authority. This project is not dependent on receiving an increase in our borrowing authority.

Hanford-John Day Alternative

Comment: *What is the latest proposal at 68/6? (Where Hanford-John Day comes in.) [PS]*

Response: Because of reliability reasons, Bonneville does not allow two 500-kV transmission lines to be closely adjacent to one another for a long distance. Once the 500-kV Hanford-John Day line joins the corridor, the proposed line would need to move to the south side of the right-of-way in order to meet reliability criteria. However,

Bonneville is considering three alternatives in this area. The north side alternative is designed to avoid impacting the homestead and is the preferred alternative. With this alternative, the line would be adjacent to the Hanford-John Day line for a short enough distance that the location would still meet reliability criteria.

Comment: *Would prefer Bonneville to cross/stay north side and span at 70/1 - 70/2, to avoid archaeological site. [PS]*

Comment: *Would prefer alternative at 68/6, moving line to the north. [PS]*

Response: Bonneville is considering the north side alternative; early engineering studies show that it would be able to span the archaeological site.

Comment: *The barn on Goldendale Aluminum's property will need to be removed since it is in the new right-of-way. Will you rebuild barn? [RS]*

Response: Bonneville would offer fair market value for the transmission line right-of-way as well as the barn. Bonneville would pay for either a commercial move or self move of the personal property stored in the barn. Bonneville would also pay for storage of the personal property for a period not to exceed 12 months if the owner of the property needed to store it on property that the owner did not already own or lease. Bonneville would not pay to rebuild the barn.

Comment: *We're concerned about where you're crossing. Can you avoid the hayfield owned by the Lee's? (see sheet 68) [RS]*

Response: If either one of the south side Hanford-John Day Junction Alternatives was chosen, one tower would be located in the hayfield with a temporary access road for construction purposes. Please see additional comments on the Hanford-John Day Alternatives page and pages 2-12 to 2-13 and Figures 2-5, 2-6, and 2-7 of the draft EIS.

Comment: *[The north side alternative] wouldn't have so many jogs in the line or road crossings. [RS]*

Response: The north side alternative would have the same number of highway crossings as the south side Alternative C and one less crossing as Alternative B. The north side Alternative A would look cleaner from the highway and from the house.

Comment: *It would be easier to relocate eight (8) towers at corridor mile 69 and 70 rather than purchase new right-of ways. [RS]*

Response: New easement would need to be purchased for both the north and south side alternatives at the Hanford-John Day Junction.

Comment: *If you stay on the north side, you'd avoid highway crossings and it would look a lot better having all the lines running parallel to one another. [RS]*

Response: Bonneville agrees that the visual impact would be less with the north side alternative. Please see comments regarding Alternative A, North Side.

Comment: *It is easiest to work in corridors miles 69 and 70, it's relatively flat and not too rocky. [PS]*

Response: Yes, the terrain is relatively easy to work with in this area.

Comment: *How much right-of-way is needed in the 68 mile area? (68/5 - 70/1) [RS]*

Response: For the south side alternatives, about 150 feet of additional right-of-way would be needed. For the north-side alternative, about 100 feet of additional right-of-way would be needed.

Corridor Mile 32-35 Alternatives (Tribal)

Comment: *How many more pieces like this one are along the way? (Alternative at corridor mile 32.) [RS]*

Comment: *When will you know whether you will reroute around tribal parcels? [RS]*

Comment: *What are the options around 32/1? [RS]*

Response: There are two Tribal parcels along the existing transmission line right-of-way in which the easements are due to expire; those parcels are located at corridor miles 32 and 35. The preferred alternative is to cross the Tribal parcels (Alternatives A at corridor miles 32 and 35); however, Bonneville is considering routing the entire corridor around the Tribal parcels. Decisions for most of the project will be announced in the Record of Decision scheduled to be released in early October 2002. However, Bonneville will be negotiating with the Yakama Nation until mid-November 2002 regarding renewing easements, so the decision to route around or cross the tribal parcels will not be announced until after November 2002.

Comment: *Is there any way you could draw out the alternative at mile 32 on a photo map? [RS]*

Response: Bonneville is currently working with the farm manager on potential locations for towers and access roads in the vineyard along Alternative B at corridor mile 32.

Comment: *The EIS should contain more information explaining why a significant part of the alternatives' development focused on considering moving the corridor off tribal lands. Are tribal owners requesting that the transmission lines not cross their lands? The EIS should identify which alternatives are more consistent with meeting federal tribal trust responsibilities. [LTR 008]*

Response: Sufficient information concerning why alternatives were developed for the proposed transmission line at locations where the line would cross lands owned by Tribal members or the Tribes is provided on page 2-13 of the draft EIS. As described on page 2-13, existing rights-of-way easements that are held by Bonneville on these lands are due to expire in 2003. Because the landowners may choose not to extend the terms of these easements, Bonneville needs to consider development of the new line (and relocation of the existing lines that follow the easements) off of these lands as an alternative to the proposed action. For any alternative where Tribal-owned lands are an issue, Bonneville will act consistently with its 1996 Tribal Policy (Appendix A and available at <http://www.bpa.gov/Corporate/KT/tribpolx.shtml>), which outlines the foundation of Bonneville's trust responsibilities as a Federal agency.

Comment: *If you could put towers near 33/1 you won't have a problem. [RS]*

Comment: *Where would the other tower end up (near tower 33/1)? Could you re-engineer this section and show me on a map? [RS]*

Response: If Corridor Mile 32, Alternative A were selected, then a proposed tower would be located adjacent to tower 33/1. If Alternative B were selected, then the existing towers, as well as the proposed new towers, would be moved just south of the existing right-of-way. We are working with the landowner/commenter on the design for this alternative.

No Action

Comment: *Page 1-3 identifies the following as a decision to be made: Bonneville must decide whether or not to build the proposed McNary-John Day transmission line. The cursory level of treatment given to the No Action Alternative indicates that it is not an option given serious consideration. Tables S-2 and 2-1 do not lay out impacts resulting from implementation of the No Action Alternative and Chapter 2 describes the No Action Alternative in two sentences. [LTR 008]*

Comment: *The EIS presents the No Action alternative in a very cursory fashion using two sentences and does not include it in tables for comparing the effects of alternatives. The EIS should discuss and evaluate the No Action alternative in greater detail and include it for comparison purposes as directed by the NEPA regulations (40 CFR 502.14). [LTR 008]*

Response: The analysis of the No Action Alternative in the draft EIS should not be construed as an indication that this alternative will not be seriously considered by Bonneville. The level of analysis provided for this alternative is merely a reflection of the lack of action (and hence impacts) that would occur under this alternative. The commenter is correct in noting that Tables S-2 and 2-1 of the draft EIS do not lay out impacts resulting from implementation of the No Action Alternative; these impacts are identified in Table 2-3 of the draft EIS. In addition, these impacts are discussed throughout Chapter 3 of the draft EIS in subsections entitled "Environmental Consequences – No Action Alternative." Furthermore, these impacts are identified for each environmental resource in the Summary section of the draft EIS. Finally, in addition to the description of the No Action Alternative in Chapter 2, Table 2-1 provides additional information about this alternative by comparing it to the stated purposes of the proposed action.

Alternatives Eliminated

Comment: *Did you look at the alternative of building the line on the Oregon side? [PS]*

Response: Bonneville considered routing alternatives in Oregon. These alternatives were eliminated from further consideration as discussed in Chapter 2, page 2-17 of the EIS.

Comment: *Page S-7 states that the overall cost of removing one of the existing lines and constructing a double circuit line would be much greater than constructing the single circuit line. The EIS should state if the benefit-cost analyses referred to in this sentence includes environmental costs. If not, the EIS should incorporate environmental costs in the analyses of overall costs. [LTR 008]*

Response: In order to be feasible, alternatives must meet the need for the project as well as the purposes. The following are the purposes or objectives of this project: maintenance of transmission system reliability; consistency with Bonneville's environmental and social responsibilities; and cost and administrative efficiency. The costs described for the double-circuit alternative referred to by the commenter do not include environmental costs. The environment was considered in terms of the potential impacts, not costs.

Comment: *We recommend that the EIS reexamine this alternative [double-circuit] because it would appear to minimize the footprint of environmental impacts. This would be consistent with NEPA's requirement to minimize impacts. [LTR 008]*

Response: As discussed on pages 2-18 and 2-19 of the draft EIS, a double-circuit alternative was considered but eliminated from detailed study. This alternative would

have cost roughly twice as much as the proposed action and would not have fulfilled the stated project purpose of cost efficiency. In addition, environmental impacts associated with constructing double-circuit towers would be about the same as the proposed action. The draft EIS provides sufficient information concerning the reasons for eliminating this alternative from detailed consideration. Because NEPA requires informed decision-making and public participation rather than the minimization of impacts, Bonneville believes the information provided in the draft EIS concerning this alternative is consistent with NEPA's requirements.

Comment: *The alternatives section effectively presents one action alternative and the No Action alternative. While the EIS presents slight variations in the alignment and presents each set of changes as different alternatives, these small changes do not sharply define the issues and provide a clear basis for choice among options by the decision maker and the public as required by NEPA (see 40 CFR 1502.14). This is especially true when larger systemic alternatives exist such as demand management, distributed generation, interruptible/curtailable rates and transmission pricing solutions as well as the possible rerouting of electricity in the grid through other transmission lines. [LTR 008]*

Response: Bonneville believes the range of alternatives evaluated in detail in the draft EIS sharply defines the issues and helps provide a clear basis for choosing among the reasonable alternatives, as required by the Council on Environmental Quality NEPA regulations. In addition, the EIS provides an adequate discussion of the reasons other potential alternatives were considered but eliminated from detailed study in the EIS. Regarding the non-transmission alternatives suggested by the commenter, these alternatives were considered but eliminated from detailed study in the draft EIS because they are not feasible alternatives for addressing the need for the proposed action (see the other NEPA-related responses to comments).

Comment: *The range of alternatives is quite constrained with variations consisting of small alignment changes in four locations. Although EPA supports limiting environmental impacts by using an area that is already impacted, this does not excuse a lead agency from its NEPA responsibility of exploring a full range of alternatives. Noticeably lacking from the alternatives' analysis are options that go beyond changes in alignment such as demand management, distributed generation, interruptible/curtailable rates and transmission pricing solutions. [LTR 008]*

Response: Bonneville believes that it has adequately explored a full range of alternatives for the proposed action in the draft EIS and that the draft EIS contains an analysis of the reasonable alternatives to the proposed action. In addition to the alternatives evaluated in detail in the draft EIS, Chapter 2 of the draft EIS identifies those alternatives that were considered but eliminated from detailed study and discusses the reasons for eliminating these alternatives from further consideration. Regarding the alternatives identified by the commenter, these alternatives were considered by

Bonneville, but were eliminated as not reasonable because they would not address the current, and especially the projected, need for additional capacity between the McNary and John Day Substations. The inability of these "non-wire" alternatives to adequately address the transmission capacity and reliability problems in this corridor is discussed on page 1-3 of the draft EIS.

The non-feasibility of these alternatives for the proposed action is also identified in a November 2001 report prepared for Bonneville entitled "Expansion of Bonneville Transmission Planning Capabilities." (Energy and Environmental Economics, Inc. et al. 2001.) This report, which has been incorporated by reference in this EIS, was prepared for Bonneville to provide recommendations concerning how Bonneville can more effectively use its planning processes in considering transmission improvement projects such as the proposed action. This report also provided an initial preliminary screening of various transmission improvement projects (including the proposed action) to determine whether non-transmission alternatives would be viable for these projects. For the proposed action, the report found that implementation of non-transmission alternatives for the proposed transmission line was not viable because this line is necessary to interconnect the proposed generation projects, and because the expected date by when these interconnections would occur did not allow time for the development and implementation of non-transmission alternatives. The report thus is consistent with the determination that non-transmission alternatives are not reasonable alternatives for the proposed action.

Table S-2: Summary of Impacts

Comment: *Table S-2 is difficult to read because the list of impacts run together and the font is small. We recommend that the table be enlarged with the impacts bulleted and possibly broken down by resources impacted. In addition, the table lacks the no-action alternative. The table should include this alternative to compare the impacts of the action alternatives, as required by the NEPA regulations. [LTR 008]*

Response: The table has been enlarged for clarity. Regarding the No Action Alternative, the summary contains text description of the impacts of the proposed action and the No Action Alternative. Table S-2 is the summary of the impacts of the short-line alternatives, segments of the overall proposed route with alternatives to address potential impacts or technical difficulties. Comparing the No Action Alterative to the overall proposed line is more appropriate than comparing it to the short sections of line.
